

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION**

<b>MICHAEL LEWIS and CAROLINA LEWIS</b>	)
	)
	)
<b>Plaintiffs,</b>	)
	)
	)
<b>v.</b>	)
	)
	)
<b>WAL-MART STORES EAST, LP and WAL-MART, INC.,</b>	)
	)
	)
<b>Defendants.</b>	)
	)

**NO.  
JURY DEMAND**

**NOTICE OF REMOVAL**

Defendant Wal-Mart Stores East, LP<sup>1</sup> hereby gives Notice of the removal pursuant to 28 U.S.C. § 1441 et. seq., of the following action filed against Wal-Mart: Michael Lewis and Carolina Lewis v. Wal-Mart Stores East, LP and Wal-Mart, Inc.; In the Circuit Court for Macon County, Tennessee at Lafayette; No. 2025-CV-7. A copy of the summons and complaint are attached hereto as Exhibit A and Exhibit B, respectively. Plaintiffs are citizens and residents of Macon County, Tennessee.

Wal-Mart Stores East, L.P. is a Delaware limited partnership of which the sole general partner is WSE Management, LLC, a Delaware limited liability company, and the sole limited partner is WSE Investment, LLC, a Delaware limited liability company. The sole member of

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<sup>1</sup>Wal-Mart Stores East, L.P. owns and operates the subject premises known as Wal-Mart located at 419 TN-52, Lafayette, Tennessee 37083. Therefore, Wal-Mart, Inc. should be dismissed from this case.

WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores, East, LLC, an Arkansas limited liability company. The sole member of Wal-Mart Stores, East, LLC is Walmart Inc., a Delaware corporation with its principal place of business in Arkansas. Therefore, all of the foregoing Wal-Mart entities are citizens of Delaware and Arkansas. The principle place of business for all Wal-Mart entities mentioned is 702 S.W. 8<sup>th</sup> Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states. Plaintiffs seek \$275,000 in damages, which is in excess of the federal jurisdictional requisite.

Wal-Mart was served on February 3, 2025. It has been less than thirty (30) days since Wal-Mart was served with the summons and complaint. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

**WHEREFORE**, defendants hereby give Notice of the removal of this action pending in the Circuit Court for Macon County, Tennessee at Lafayette, to the United States District Court for the Middle District of Tennessee, Northeastern Division, and requests that the proceedings be held thereon.

**RESPECTFULLY SUBMITTED:**

s/ Greg Callaway  
Greg Callaway, No. 18575  
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Attorney for Defendants

## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served in accordance with F.R.C.P. 5(b) via email [ali@tollfirm.com](mailto:ali@tollfirm.com) upon Ali Toll, The Toll Firm, PC, 116 East Cedar Street, Goodlettsville, TN 37072, and via email [virginia@tollfirm.com](mailto:virginia@tollfirm.com) upon Virginia King, The Toll Firm, PC, 116 East Cedar Street, Goodlettsville, TN 37072; on this 3<sup>rd</sup> day of March, 2025.

s/ Greg Callaway

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